

1 PHILLIP A. TALBERT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant United States Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700
5 Attorneys for the United States
6
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$10,000.00 IN
U.S. CURRENCY,
15 Defendant.
16

2:22-MC-00215-KJM-AC

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Darrel
18 Jackson (“claimant”), appearing *in propria persona*, as follows:

19 1. On or about April 8, 2022, claimant filed a claim in the administrative forfeiture proceeding
20 with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately \$10,000.00
21 in U.S. Currency (hereafter “defendant currency”), which was seized on February 16, 2022.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
That deadline was July 7, 2022.

4. By Stipulation and Order filed July 13, 2022, the parties stipulated to extend to August 5, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to September 6, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to September 6, 2022.

Dated: 8/5/2022

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

Dated: 8/5/2022

/s/ Darrel Jackson
DARREL JACKSON
Potential Claimant
Appearing in propria persona
540 Humphries Street #2118
Atlanta, GA 30312
(Signature authorized by phone)

IT IS SO ORDERED.

DATED: August 10, 2022.


CHIEF UNITED STATES DISTRICT JUDGE